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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Master Docket No.: 4:20-cv-03056-DMR

**NOTICE OF MOTION AND MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: Sept. 30, 2021
Time: 1:00 p.m.
Courtroom: via videoconference only
Judge: The Hon. Donna M. Ryu

NOTICE OF MOTION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs Caroline Anderson, James Cottle, Rachel Curtis, David Evans, Logan Mitchell, Alexis Mullen, Jordan Sacks, Frederick Schoeneman, Gabriel Sotelo, Jeffrey Umali, and Nicholas Yeomelakis (together, “Plaintiffs”) will move the Court for an order, pursuant to Federal Rule of Civil Procedure (“Rule”) 23(e), granting preliminary approval of the proposed class action Settlement Agreement¹ entered into by Plaintiffs and Defendant Plaid Inc. (“Plaid”) (collectively, “Parties”), on September 30, 2021 at 1:00 p.m., in Oakland, CA via videoconference only, before The Honorable Donna M. Ryu, United States Magistrate Judge for the Northern District of California, consistent with the following:

- a. Granting preliminary approval of the proposed Settlement Agreement entered into between the Parties;
- b. Determining that the Court, at the final approval stage, will likely certify the settlement Class as defined in the Settlement Agreement;
- c. Appointing Plaintiffs as Class Representatives of the proposed Class;
- d. Appointing Shawn Kennedy of Herrera Kennedy LLP (“HK”), Rachel Geman of Lief Cabraser Heimann & Bernstein LLP (“LCHB”), and Christopher Cormier of Burns Charest LLP (“BC”) as Class Counsel for the proposed Class;
- e. Approving the Parties’ proposed Notice Program outlined herein, including the proposed “Notice of Class Action Settlement” Long Form (“Long Form Notice”), and directing that notice be disseminated pursuant to the Notice Program;²
- f. Appointing Angeion Group, LLC as Notice Administrator, and directing Angeion to carry out the duties and responsibilities of the Class Administrator specified in the Settlement Agreement;
- g. Staying all non-settlement related proceedings in the above-captioned case pending final approval of the Settlement Agreement; and
- h. Setting a Fairness Hearing and certain other dates in connection with the final approval of the Settlement Agreement.

¹ See Settlement Agreement of July 30, 2021, attached as Exhibit A to the Declaration of Shawn M. Kennedy (“Kennedy Decl.”) filed herewith.

² See Declaration of Steven Weisbrot, Esq. of Angeion Group LLC (“Angeion”); and Long Form Notice attached as Exhibit C to the Settlement Agreement (Kennedy Decl., Ex. A).

1 This Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of
2 Points and Authorities, the Declaration of Shawn M. Kennedy, with supporting exhibits; the
3 Declaration of Steven Weisbrot, Esq. of Angeion with supporting exhibits; the Declaration of The
4 Honorable Jay C. Gandhi (ret.); the argument of counsel, all papers and records on file in this
5 matter; and such other matters as the Court may consider.

6
7 Dated: August 6, 2021

Respectfully submitted,

8 HERRERA KENNEDY LLP

9 By: /s/ Shawn Kennedy

10 Shawn M. Kennedy

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